

1	Q.	I think you said earlier there's some	14:31:22
2		speculation of whether Mr. McKinney was reaching for	14:31:24
3		something or going to get something and that's why	14:31:27
4		he moved. Do you know that for a fact? Is that	14:31:29
5		just people kind of guessing what might have	14:31:32
6		happened?	14:31:33
7	A.	I do not know that for a fact. That's just	14:31:34
8		us talking, trying to figure out why he went back	14:31:36
9		in.	14:31:39
10	Q.	Do you know if Curtis saw Mr. McKinney move	14:31:40
11		at any point after giving the all clear?	14:31:41
12	A.	I'm not sure. I can't say what -- what	14:31:45
13		Curtis saw or anything. I just -- I know that he	14:31:49
14		could have, yeah, but I don't think he -- I don't	14:31:53
15		know what he saw to that.	14:31:55
16	Q.	Is there any reason why Mr. McKinney couldn't	14:31:57
17		have just left the straps there and waited till	14:32:01
18		after the materials were unloaded to move the	14:32:04
19		straps?	14:32:07
20	A.	Yes. I mean, that's what he should have	14:32:08
21		done. Yes.	14:32:09
22	Q.	So you're saying he should have just waited	14:32:12
23		till the materials were unloaded?	14:32:14
24	A.	Yes.	14:32:16
25	Q.	Okay. Did any of the first responders onsite	14:32:16

1	when you were there ask you or anyone at Jenkins &	14:32:46
2	Stiles to leave any materials where they were or to	14:32:51
3	leave the site untouched?	14:32:53
4	A. No.	14:32:56
5	Q. Did -- you were gone by the time TOSHA	14:32:58
6	arrived, correct?	14:32:59
7	A. Yes.	14:33:01
8	Q. Are you aware of anyone from TOSHA or any of	14:33:02
9	the first responders telling you or anyone at	14:33:04
10	Jenkins & Stiles to leave the scene untouched?	14:33:06
11	A. No. No. They didn't say that.	14:33:11
12	Q. Have you ever heard of any sort of	14:33:26
13	installation guide from Metl-Span, NCI Group, NBCI,	14:33:28
14	or Nucor -- an installation guide about their	14:33:35
15	insulated metal panels?	14:33:38
16	A. No, I've not.	14:33:41
17	Q. Have you ever seen any sort of installation	14:33:43
18	guide? Have you ever seen any sort of metal panel	14:33:45
19	installation guide?	14:33:47
20	A. We have a set of shop drawings that -- that	14:33:49
21	shows, but no, I've not seen the --	14:33:51
22	Q. Do the shop drawings say anything about how	14:33:54
23	to unload materials from a truck or trailer?	14:33:56
24	A. No, they don't.	14:33:58
25	Q. Are you aware of anyone, whether from Jenkins	14:33:59